

SoCal Structural Training Branch 1 CAP Collected Questions – Demo Station 3 (PB)

The following are some questions about CAP “gray areas” that county staff asked at the (SoCal April 28) CAP demo station #3 – “CAP exterior prep”, where Lee from Beneficial covered CAP document pages 3-4 in depth.

1. If the ducted aeration fan(s) failed at some time during the Step 1 minimum hours, but CAC and company uncertain when the failure occurred because not onsite:
 - a) Does the licensee don SCBA to go in and fix it? Or could an unlicensed crew member with SCBA go in without a licensee being present? In either case, would there have to be 2 trained persons (and 2 SCBA) present?
 - b) Also assuming company couldn't determine when fans “failed” during Step 1 hours, would the “minimum aeration time” clock start over? Or do they just have to wait until the original Step 1 # hours and test after the Step #3? How could CAC enforce a minimum number of hours in these situations when there's no requirement to notify CAC when there's a failure?
2. When could CAC allow exception for the Step 1 to start “during the hours of midnight to 30 minutes before dawn” time period?
3. If “blown tarp” (or break-in) occurs just before or during CAP Step 1 hours, does the company need to go ahead and wait the CAP minimum number of hours if they don't know exactly when the tarp opened?
4. For companies using CAP, WHEN can the CAC enforce “SCBA must be onsite”? CAC staff are confused about this issue, especially regarding SCBA and Section 6782 requirement for “2 trained must be onsite”.
5. Since CAP violations would be Class B or A level NOPA: What “official source” should CACs use to determine what exact time each day is “dawn” in order to calculate if the licensee initiates CAP Step 1 no earlier than “30 minutes before dawn”? Newspaper? Weather Channel TV or Online sources? **[NOTE:** This could be a significant enforcement issue for counties checking fume logs during HQ/Records inspections after the fact, not just onsite during specific site's aeration/certification.]